The revolutions against Spain and the United States first permitted of a practical demonstration of Filipino aptitude for self-government. The two most important constitutional documents of this period were the Provisional Constitution of Biak-na-bato, planned by Isabelo Artacho, and the Malolos Constitution of the Philippine Republic, the work principally of Felipe Calderon. Later, formal action thrice taken by the Philippine Assembly demonstrated the easily understood desire of the Filipino people to substitute a constitution of their own making for one imposed by a foreign sovereignty. That aspiration was properly satisfied by the right conceded by the Philippine Commonwealth and Independence Law to hold a constitutional convention and prepare a constitution.

It is difficult to place one's finger on any one date or any one document as evidencing the genesis of the Philippine Constitution. Yet it may be said that until the enactment of the Philippine Commonwealth and Independence Law on March 24, 1934, the three most important organic laws were the Instructions of the President to the Second Philippine Commission of April 7, 1900, the Philippine Bill, or the Act of Congress of July i, 1902, and the Jones Law, or the Act of Congress of August 29, 1916. The Instructions were drafted by Secretary of War Root for the guidance of the Philippine Commission and have rightly been acclaimed as a great state paper. The Philippine Bill, although it did not create a new government, was the basic law for fourteen years. The Jones Law was more nearly like an organic

act and except that it was susceptible to divergent interpretations, was otherwise acceptable.

Side by side with the organic laws has marched Philippine constitutional development by judicial interpretation. The Supreme Courts of the Philippines and the United States have given the Islands all that was best in American constitutional law. As in the United States, they have assumed the duty of enforcing the organic laws. When the choice was be-